

EXHIBIT F

From: [Lauter, Judd](#)
To: [Joshua Stein](#); [Stameshkin, Liz](#); [Kathleen Hartnett](#); [Reed Forbush](#); [Maxwell Pritt](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSE](#); [Josh Schiller](#); [David Boies](#); [Jesse Panuccio](#)
Cc: [Ghazarian, Colette A](#); [Poppell, Cole A](#); [Dunning, Angela L](#); [Ghajar, Bobby A.](#); [Alvarez, Jessica](#); [Weinstein, Mark](#); [z/Meta-Kadrey](#)
Subject: Re: Kadrey v. Meta - Deposition limit letter/other scheduling issues
Date: Tuesday, October 15, 2024 10:29:54 PM

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Counsel:

In advance of our meet and confer regarding existing written discovery, we highlight the below issues for discussion:

RFPD Responses and Documents

- **Meta’s RFP No. 1** requests, “Complete copies of copyright registrations and deposit material for each of YOUR ASSERTED WORKS.” Plaintiffs have yet to produce copyright registration certificates for a number of the Asserted Works and have produced no deposit copies of their Asserted Works. There remains an absence of copyright applications for the vast majority of the works. We note that the Court compelled Plaintiffs to produce such documents within their possession, custody, or control by September 30, 2024. Order, ECF No. 147.
- **Meta’s RFP No. 36** asks Plaintiffs to “Produce all COMMUNICATIONS on any email or social media account YOU identified in response to Interrogatory No. 14 that discuss or relate to Meta, the Action, YOUR claims in the Action, YOUR use of any generative AI product or service, or any license of YOUR ASSERTED WORKS.” While certain Plaintiffs have produced some documents responsive to this request, Plaintiffs only responded requesting to meet and confer regarding the scope of the request. We note that Plaintiff TerKeurst agreed to produce responsive documents “that are not equally accessible to Meta.” It is not proper to object to a request for the production of documents on the ground that the requested documents assertedly are equally available to the requesting party. See, e.g., *Smith v. Montoya*, 2021 WL 6618858, at *1 (E.D. Cal. July 21, 2021).
- **Meta’s RFP No. 47** requests, “All declarations or affidavits YOU have signed for use in any other copyright infringement, DMCA, or right of publicity litigation, together with any attached exhibits or materials.” Plaintiffs have yet to produce responsive documents and instead requested that the parties meet and confer. We note this does not apply to Plaintiff TerKeurst, who agreed to produce documents responsive to this request.

- **Meta’s RFP No. 49** requests, “DOCUMENTS sufficient to identify each instance in which YOU or YOUR AGENTS provided free copies of any of YOUR ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.” Plaintiffs have yet to produce responsive documents and instead requested that the parties meet and confer claiming that the request as written is overbroad. Plaintiffs (or their agents) presumably keep track of promotional activities for their asserted works – including sending free copies of their works for soliciting reviews, commentary, criticism, endorsements, or summaries, so we need to understand the basis of Plaintiffs’ objection. We note this does not apply to Plaintiff TerKeurst, who agreed to produce documents responsive to this request.
- **Meta’s RFP No. 50** requests, “DOCUMENTS sufficient to identify each literary work, (by title and author) that YOU purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing YOUR ASSERTED WORKS, whether or not such works are identified as reference material in YOUR ASSERTED WORK.” Plaintiffs have refused to produce documents responsive to this request. This request is relevant to understanding the scope of Plaintiffs’ rights and the first fair use factor. Plaintiffs must produce documents responsive to this request. We note this does not apply to Plaintiff TerKeurst, who agreed to produce documents responsive to this request.
- **Meta’s RFP 53** requests, “All DOCUMENTS that any of YOUR testifying experts have relied on or may rely on in forming any opinions in this ACTION.” Plaintiffs claim they have no such documents in their possession, custody, or control. Given our understanding that Plaintiffs have retained and are actively working with experts in this action, we find it unlikely that Plaintiffs are in possession of no documents relied on by these experts in forming their opinions. We note this does not apply to Plaintiff TerKeurst, who agreed to produce documents responsive to this request.
- **Meta’s RFP No. 57** requests, “ALL DOCUMENTS CONCERNING COMMUNICATIONS between YOU or YOUR counsel or YOUR agent and any other author about the prospect of becoming a named plaintiff in this ACTION or joining this ACTION.” Plaintiffs responded that “other than attorney-client privilege material, no responsive material exists.” However, this request is clearly asking for communications with authors about the *prospect* of becoming a named plaintiff in this action, which would clearly take place before any attorney client relationship existed. We note that Plaintiff TerKeurst agreed to produce documents responsive to this request, subject to objections, including that the request is overly broad as to “any other author.” Please confirm whether Ms. TerKeurst is withholding any documents based on her objections.

As a broader matter, we observe that the method of collection and diligence regarding document collection differed among the various Plaintiffs. For example, counsel for Ms.

TerKeurst used an e-discovery vendor to collect ESI such as text messages and emails. It does not appear that other Plaintiffs have done the same. Conversely, we understand from the depositions of others, such as Mr. Golden, that they merely forwarded emails and documents to counsel; that is, counsel did not access their devices or files and undertake a holistic collection and review, much less a collection of native files. Given the disparity in the way Plaintiffs undertook document collection, we have concerns over the completeness and subjectivity of the document collection for the Saveri Plaintiffs and, although not all of their depositions have occurred, the Cafferty Clobes Plaintiffs.

Interrogatory Responses

- **Meta's Interrogatory Nos. 12 and 13** seek information regarding circumstances in which Plaintiffs have authorized any person to license their works. Plaintiffs have identified written licenses that they produced. To the extent Plaintiffs have provided any such authorizations informally or in writing, Plaintiffs must supplement their responses to reflect these authorizations or state that none exist. Plaintiff TerKeurst responded relying on Rule 33(d), but has not supplemented her response to identify responsive documents, and must do so.
- **Meta's Interrogatory No. 14** seeks information relating to Plaintiffs' email and social media accounts. Plaintiffs have requested to meet and confer regarding the scope of this interrogatory.
- **Meta's Interrogatory No. 15** seeks information relating to Plaintiffs' or their agents' use of generative AI products or services. Plaintiffs have requested to meet and confer regarding the scope of this interrogatory, claiming that the information is unknown to them. Meta is willing to limit the scope this interrogatory to include the use of generative AI by Plaintiffs personally or by their agents at Plaintiffs' direction/under their control or otherwise with their knowledge. Please confirm that Plaintiffs will respond to the interrogatory as narrowed.
- **Meta's Interrogatory No. 18** seeks Plaintiffs' contentions why Meta's alleged use of Plaintiffs' asserted works are not fair use. Plaintiffs inexplicably refused to provide substantive responses, suggesting that it could not prepare a response as AEO information could not be shared with individual Plaintiffs, and that Meta has the burden of proof on this defense. Neither of these excuse Plaintiffs' failure to respond to this Interrogatory.
- As a general matter, Plaintiff TerKeurst responded to several Interrogatories relying on Rule 33(d), but has not supplemented her responses to identify any documents. Please confirm Ms. TerKeurst will do so.

As to specific Plaintiffs, we further note the following open issues, which were identified in depositions of the Plaintiffs:

- **Mr. Hwang** (deposed Sep. 16, 2024) – we have yet to receive:
 - communications with the Creative Artists Agency (CAA), though he represented that they were asked to investigate and acquire his copyright filings for this case and that he believed the same were provided to his counsel. Hwang Dep. Tr. 44:15–45:7.
 - Communications with Ms. Waldman and other members of the WhatsApp group message chain, in which this suit was discussed. Hwang Dep. Tr. 205:8–19. Mr. Hwang testified that he was still on the chat thread, yet Cafferty Clobes indicated he no longer has the text. Please explain what happened to the text and efforts made to retrieve it.
 - Documents that comprise the remainder of the messages between Mr. Hwang and Messrs. Lundberg and Wirth (produced in part at Hwang Bates No. 7)
 - We ask for confirmation that Mr. Hwang’s production relating to his use of AI products is completed.
- **Mr. Golden** (deposed Sep. 17, 2024) – we have yet to receive:
 - the remainder of the messages between Mr. Golden and Mr. Brom produced in part at Golden Bates No. 2582. Golden Dep. Tr. 52:7–9–22.
- **Mr. Greer** (deposed Sep. 24, 2024) – we have yet to receive:
 - documents sufficient to identify Mr. Greer’s initial awareness of alleged infringement. Greer Dep. Tr. 67:5–19.
 - the full version of the ChatGPT prompts and outputs produced in part at Greer Bates Nos. 2–43. Greer Dep. Tr. 189:15–190:20. We note that Mr. Hwang subsequently produced full versions that were not similarly cut off and suggest that Mr. Greer follow the same protocol.
 - the agreement with The New Yorker re: LESS, referenced at Greer Bates No. 165. Greer Dep. Tr. 321:3–20.
- **Ms. Woodson** (deposed Sep. 30, 2024) – we have yet to receive:
 - The text messages between Ms. Woodson and Ms. Waldman related to this case. Woodson Rough Dep. Tr. 48:10–49:15.
- **Ms. Silverman** (deposed Oct. 10, 2024) – we have yet to receive:
 - All documents and communications responsive to Meta’s discovery requests that Ms. Silverman failed to search for or produce on the basis that such records were “public facing.” Silverman Rough Dep. Tr. 133 *et seq.*
 - Drafts of the manuscript, in native and print form, for *The Bedwetter*. Silverman

Rough Dep. Tr. 255-56.

We look forward to a collaborative discussion to resolve these issues. Meta reserves all rights, including as to any deficiencies revealed in the course of the depositions that have yet to occur and as to responses to discovery and documents just produced or not yet produced.

Regards,
Judd

Judd Lauter

Cooley LLP
+1 415 693 2915 office
jlauter@cooley.com

From: Joshua Stein <jstein@bsfllp.com>
Sent: Tuesday, October 15, 2024 5:55 PM
To: Stameshkin, Liz <lstameshkin@cooley.com>; Hartnett, Kathleen <khartnett@cooley.com>; Reed Forbush <rforbush@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>
Cc: Ghazarian, Colette A <cghazarian@cooley.com>; Poppell, Cole A <CPoppell@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
Subject: RE: Kadrey v. Meta - Deposition limit letter/other scheduling issues

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Thank you. We will see you then.

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Meeting URL: [https://bsflp.zoom.us/j/93646183262?
pwd=nRyDlOuLsihvhISCCMEcoLR2oRIWMR.1](https://bsflp.zoom.us/j/93646183262?pwd=nRyDlOuLsihvhISCCMEcoLR2oRIWMR.1)

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- 833 548 0282 US Toll-free
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[213.244.140.110](#) (Germany)

[103.122.166.55](#) (Australia Sydney)

[103.122.167.55](#) (Australia Melbourne)

[149.137.40.110](#) (Singapore)

[64.211.144.160](#) (Brazil)

[159.124.132.243](#) (Mexico)

[159.124.168.213](#) (Canada Toronto)

[65.39.152.160](#) (Canada Vancouver)

[207.226.132.110](#) (Japan Tokyo)

[149.137.24.110](#) (Japan Osaka)

Meeting ID: 936 4618 3262

Passcode: 592759

SIP: 93646183262@zoomcrc.com

Passcode: 592759

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Tuesday, October 15, 2024 3:05 PM

To: Joshua Stein <jstein@bsfllp.com>; Kathleen Hartnett <khartnett@cooley.com>; Reed Forbush <rforbush@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>

Cc: Ghazarian, Colette A <cghazarian@cooley.com>; Poppell, Cole A <CPoppell@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Deposition limit letter/other scheduling issues

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Hi Josh,

We can do 2 pm on our end.

Best,

Liz

From: Joshua Stein <jstein@bsfllp.com>

Sent: Tuesday, October 15, 2024 12:15 PM

To: Hartnett, Kathleen <khartnett@cooley.com>; Reed Forbush <rforbush@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>

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Subject: RE: Kadrey v. Meta - Deposition limit letter/other scheduling issues

[External]

Kathleen,

Could you let us know if counsel for Meta is available to meet and confer on our two letters (referenced below at No. 3) tomorrow?

At present, 11am or after 2pm (both Pacific) would work well on our end.

Thank you.

Best,

Josh

From: Kathleen Hartnett <khartnett@cooley.com>

Sent: Thursday, October 10, 2024 3:44 PM

To: Reed Forbush <rforbush@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou

<mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfillp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>

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Thank you, Reed. We appreciate the confirmation and will get back to you on (4).

Thanks,
Kathleen

From: Reed Forbush <rforbush@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:38 PM

To: Hartnett, Kathleen <khartnett@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfillp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>

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[External]

Kathleen - Thank you for your email.

1. Separate emails exchanged today confirm the parties are at an impasse on the deposition limits in your first point. We agree to and will go forward with your proposed briefing schedule for tomorrow (Friday).
2. As to your second point, Plaintiffs agree to the same briefing schedule for Monday with respect to restrictions on Mr. Zuckerberg's deposition.
3. We are available for a 9 am or 10 am pacific start time on Wednesday 10/16 to meet and confer on the two letters.
4. David Simons from my firm sent a proposed case schedule to you just before noon this morning. We will look out for your response.

Best regards,
Reed
646-339-8787

Reed D. Forbush
Counsel

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rforbush@bsfllp.com
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From: Hartnett, Kathleen <khartnett@cooley.com>

Sent: Thursday, October 10, 2024 10:50 AM

To: Lauter, Judd <jlauter@cooley.com>; Maxwell Pritt <mpritt@BSFLLP.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman

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Counsel,

We write to follow up on several scheduling issues.

First, we have not received a response to our October 8 email below regarding the joint letter on deposition limits due to the Court tomorrow, October 11. We asked for Plaintiff's proposal to see if the parties might reach an agreement. Please let us know if Plaintiffs are amenable to a discussion or other exchange of proposals in advance of tomorrow.

Relatedly, we also proposed the following schedule for exchange of our respective portions of the letter:

- Plaintiffs send their portion to Meta at 10am
- Meta provides its portion by 6pm
- Plaintiffs provide further edits along with any supporting exhibits and declarations by 8pm
- Meta provides further revisions, if any, or approval to file by 9pm
- On or before 10:30pm, the parties make best efforts to finalize and file

Please confirm if you agree.

Second, following yesterday's meet and confer regarding Mr. Zuckerberg's deposition, the parties appear to be at an impasse. We have provided Mr. Zuckerberg's date of availability, October 25, and Meta intends and expects to produce his custodial documents in advance of that date. We understand that Plaintiffs are declining to take his deposition on that date, and will not limit the duration of his deposition. Accordingly, we will be moving for a protective order.

We had asked to file the joint motion today, as we want to bring this to the Court's attention immediately. Based on your representations during our call about your availability this week, and in order to accommodate the schedule and circumstances of certain of Plaintiffs' counsel, Meta agrees to file our joint dispute letter regarding Mr. Zuckerberg's deposition on Monday, October 14. Meta will provide its portion of a joint discovery letter by 10am on Monday, October 14, and propose that the parties adopt the same briefing schedule to what we've proposed above (i.e., with the parties

making best efforts to finalize and file by 10:30 pm). We are mindful that both Judge Hixson and Judge Chhabria have urged the parties to address any discovery disputes quickly and, given the October 25 availability, we cannot wait longer than Monday to file. Please confirm you agree to this schedule.

Third, we are in the process of reviewing the two letters sent by Josh Stein yesterday morning. Given the length of the letters and the numerous issues raised, we will provide substantive responses early next week and meet and are prepared to confer shortly thereafter. Please let us know your availability for a call next Wednesday or Thursday.

Fourth, as you know, the parties are required to meet and confer regarding the scheduling stipulation. We will share our response to Plaintiffs' proposal shortly under separate cover.

Thanks,
Kathleen

Kathleen R. Hartnett

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From: Lauter, Judd <jlauter@cooley.com>

Sent: Tuesday, October 8, 2024 2:46 PM

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Subject: Kadrey v. Meta - Deposition limit letter

Counsel,

As you know, the parties are required to submit a joint letter setting forth our respective deposition limit proposals on Friday. As Plaintiffs are the ones who sought additional time and discovery, we would like to understand Plaintiffs' proposal to see if the parties might reach agreement. Please let us know.

As to the timing of the parties' exchange of their respective portions of the joint letter, we suggest that the parties' adopt the same schedule used for Plaintiffs' last motion (i.e. Plaintiffs send their portion to Defendant on 10am on 10/11, Defendant provides its portion by 6pm; Plaintiff provides further edits along with any supporting exhibits and declarations by 8pm; Defendant provides further revisions, if any, or approval to file by 9pm; and on or before 10:30pm, and the parties make best efforts to finalize and file). Please confirm.

Regards,

Judd

Judd Lauter

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